

## REMARKS

### Status of Claims

Claims 1-32 are canceled without prejudice or disclaimer. Claims 33-57 have been added and are fully supported by Applicant's disclosure.

### Rejections of Claims 1, 7, 8, 11, 13-16, 18-22, 24-27, and 29 are Moot

The Office has rejected claims 1, 7, 8, 11, 13-16, 18-22, 24-27, and 29, at paragraphs 2 and 3 of the Final Action, under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,798,767 ("Alexander"). Applicant respectfully submits that the rejections of claims 1, 7, 8, 11, 13-16, 18-22, 24-27, and 29 are moot because claims 1, 7, 8, 11, 13-16, 18-22, 24-27, and 29 have been canceled.

### Rejections of Claims 2, 23, and 30-32 are Moot

The Office has rejected claims 2, 23, and 30-32, at paragraphs 4 and 5 on pages 7-9 of the Final Action, under 35 U.S.C. §103(a) as being unpatentable over Alexander in view of U.S. Patent Application Publication No. 2004/0208185 ("Goodman"). Applicant respectfully submits that the rejections of claims 2, 23, and 30-32 are moot because claims 2, 23, and 30-32 have been canceled.

### Rejections of Claims 5, 10, and 28 are Moot

The Office has rejected claims 5, 10, and 28, at paragraphs 4 and 5 on pages 9 and 10 of the Final Action, under 35 U.S.C. §103(a) as being unpatentable over Alexander in view of U.S. Patent Application Publication No. 2004/0180646 ("Donley"). Applicant respectfully submits that the rejections of claims 5, 10, and 28 are moot because claims 5, 10, and 28 have been canceled.

### Claims 33-57 are Allowable Over the Prior Art of Record

None of the cited references, including Alexander, Goodman, or Donley, whether alone or in combination, disclose or suggest each and every element of claims 33, 42, and 57. For example, Alexander, Goodman, and Donley do not disclose or suggest storing first call

connection information and second call connection information at a mediation server, wherein the first call connection information includes a first set of call receipt rules that relate to a first format of IP data that is acceptable to a first plurality of devices associated with a first managed IP network and wherein the second call connection information includes a second set of call receipt rules that relate to a second format of IP data that is acceptable to a second plurality of devices associated with a second managed IP network, as recited in claims 33, 42, and 57. Further, Alexander, Goodman, and Donley do not disclose or suggest sending first connection information related to a device associated with the first managed IP network from a mediation server to a device associated with a second managed IP network in response to a query from the device associated with the second managed IP network, as recited in claims 33, 42, and 57. Hence, claims 33, 42, and 57 are allowable over the prior art of record.

Claims 34-38 depend from claim 33, and claims 43-50 depend from claim 42, which Applicant has shown to be allowable. Hence, Alexander, Goodman, and Donley fail to disclose at least one element of each of claims 34-38 and 43-50. Accordingly, claims 34-38 and 43-50 are also allowable, at least by virtue of their dependency from claim 33 or claim 42.

Further, the dependent claims include additional features that are not disclosed or suggested by Alexander, Goodman, and Donley. For example, Alexander, Goodman, and Donley do not disclose or suggest that the mediation server does not provide call signaling information or call data to the first plurality of devices, the second plurality of devices, or any combination thereof, as recited in claim 34. For this additional reason, claim 34 is allowable.

In addition, Alexander, Goodman, and Donley do not disclose or suggest that the network interface engine communicates with the first managed IP network via a first private network and communicates with the second managed IP network via a second private network, as recited in claim 43. For this additional reason, claim 43 is allowable.

None of the cited references, including Alexander, Goodman, and Donley disclose or suggest the specific combinations of claims 39 and 51. For example, Alexander, Goodman, and Donley do not disclose or suggest converting IP data associated with a call placed from a device

associated with a first managed IP network to a device associated with a second managed IP network to a format of IP data that is acceptable to the device associated with the second managed IP network, where the call IP data is converted at the device associated with the first managed IP network, as recited in claims 39 and 51. Hence, claims 39 and 51 are allowable over the prior art of record.

Claims 40-41 depend from claim 39, and claims 52-56 depend from claim 51, which Applicant has shown to be allowable. Hence, Alexander, Goodman, and Donley fail to disclose at least one element of each of claims 40-41 and 52-56. Accordingly, claims 40-41 and 52-56 are also allowable, at least by virtue of their dependency from claim 39 or claim 51.

Further, the dependent claims include additional features that are not disclosed or suggested by Alexander, Goodman, and Donley. For example, Alexander, Goodman, and Donley do not disclose or suggest that the device associated with the first managed IP network provides a calling party associated with the first managed IP network with the option to complete the call as a VoIP call or as a circuit switched call, as recited in claim 40. For this additional reason, claim 40 is allowable.

In addition, Alexander, Goodman, and Donley do not disclose or suggest sending a query from the first managed IP network device to an information store to identify connection information relating to a device associated with a third managed IP network and receiving an indication that the requested connection information is not available at the information server, as recited in claim 52. For this additional reason, claim 52 is allowable.

### CONCLUSION

Applicant has pointed out specific features of the claims not disclosed, suggested, or rendered obvious by the references applied in the Office Action. Accordingly, Applicant respectfully requests reconsideration and withdrawal of each of the objections and rejections, as well as an indication of the allowability of each of the pending claims.


Any changes to the claims in this amendment, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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Date

  
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